

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

(202) 955-9600

FACSIMILE

(202) 955-9792

www.kelleydrye.com

NEW YORK, NY
TYSONS CORNER, VA
CHICAGO, IL
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TOKYO, JAPAN

DIRECT LINE: (202) 955-9766

EMAIL: eemmott@kelleydrye.com

January 16, 2004

VIA UPS AND ELECTRONIC MAIL

Ms. Mary Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station
Boston, MA 02110

**Re: DTE 03-60: Response of Focal Communications Corporation of
Massachusetts to MCI's First Set of Information Requests to CLECs**

Dear Ms. Cottrell:

Enclosed please find and original and nine copies of the response of Focal Communications Corporation of Massachusetts to MCI's first set of information requests to competitive local exchange carriers. Please note that these responses are labeled "CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER" and are subject to the terms of the Protective Order in this docket.

Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,



Erin Weber Emmott

Enclosures

cc: Paula Foley, Hearing Officer (via email)
Richard C. Fipphen, MCI (via email)
DTE 03-60 Service List

MCI-CLEC-1 Please state whether you are an incumbent local exchange provider ("ILEC") or are an affiliate of an ILEC providing telecommunications service in Massachusetts. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1)

RESPONSE: No, Focal Communications Corporation of Massachusetts, Inc. ("Focal") is not an incumbent local exchange provider or an affiliate of an ILEC.

MCI-CLEC-2 Please state whether you are an affiliate of a competitive local exchange carrier ("CLEC") providing telecommunications service in Massachusetts. If you are an affiliate of a CLEC, please identify the CLEC and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1)

RESPONSE: Focal is a certificated CLEC in Massachusetts.

MCI-CLEC-3 Do you lease 2-wire voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a DS-1.)

RESPONSE: Focal leases special access T1's from Verizon, which Verizon delivers on either 2 wire HDSL-type loops or on standard 4 wire T1 pipes.

MCI-CLEC-4 Do you use non-ILEC switches to provide local exchange service to Massachusetts customers? (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a DS-1.)

RESPONSE: No, Focal utilizes only its own switch.

MCI-CLEC-5

To the extent that you have not already provided this information in response to the Massachusetts Department of Telecommunications and Energy's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers

- a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");
- b. V&H coordinates;
- c. street address, city and zip code;
- d. currently equipped line side capacity in
 - i. DS-0/voice grade circuits and
 - ii. DS-1 circuits;
- e. currently utilized line side capacity in
 - i. DS-0/voice grade circuits and
 - ii. DS-1 circuits;
- f. current switch processor capacity in CCS;
- g. busy hour and busy season utilized switch processor capacity in CCS;
- h. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]).

RESPONSE: Focal has already provided this information in its response to the information requests issued by the Massachusetts Department of Telecommunications and Energy.

MCI-CLEC-6 Using the switches identified in CLEC-5:

- a: Do you currently provide local exchange service to residential customers in Massachusetts? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].
- b. Do you currently provide local exchange service to business customers in Massachusetts? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.
- c: Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts customers using voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

Product Name	Available to Res. Customers?	Available to Bus. Customers?	Retail Price?	Bundled with LD or DSL Service?	Available as Standalone Local Product?	Currently Advertising?	Currently Marketing?
[Name of product]	[Yes/No]	[Yes/No]	[\$X.XX]	[Yes/No]	[Yes/No]	[Yes/No]	[Yes/No]

- d. For each switch identified in CLEC-5 other than circuit switches, please provide the following additional information regarding the local exchange service that you provide:
 - i. How many telephony customers do you serve via that switch?
 - ii. To what percentage of those customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the retail price for this service?
 - iii. To what percentage of those customers do you provide local exchange service and broadband service but not cable television service? What is the price for this service?
 - iv. To what percentage of those customers do you provide local exchange service and cable television service but not broadband service? What is the price for this service?
 - v. To what percentage of those customers do you provide local exchange service, cable television service, and broadband service? What is the price for this service?

RESPONSE: (a) No, Focal does not currently provide local exchange service to residential customer in Massachusetts. (b) Yes, Focal provides local exchange service to business customers. Yes, Focal is currently advertising this service. Yes, Focal is currently marketing this service. Local exchange service to business customers in Massachusetts is a key market segment for Focal. (c) Focal provides its services only on T-1 and above facilities. (d) This question is not applicable.

MCI-CLEC-7 Please provide, on a statewide, CLEC switch CLLI-code, and Verizon wire center basis, on a monthly or quarterly basis, for the most recent 12-month period, the number of:

- a. Newly installed business lines served by unbundled loops;
 - vi. Number of such lines that were migrated from the ILEC's retail service.
 - vii. Number of such lines that were migrated from a CLEC's retail service.
- b. Newly installed business lines served by UNE-P;
 - i. Number of such lines that were migrated from the ILEC's retail service.
 - ii. Number of such lines that were migrated from a CLEC's retail service.
- c. Newly installed business lines served by non-circuit switches;
 - i. Number of such lines that were migrated from the ILEC's retail service.
 - ii. Number of such lines that were migrated from a CLEC's retail service.
- d. Newly installed residential lines served by unbundled loops;
 - i. Number of such lines that were migrated from the ILEC's retail service.
 - ii. Number of such lines that were migrated from a CLEC's retail service.
- e. Newly installed residential lines served by UNE-P.
 - i. Number of such lines that were migrated from the ILEC's retail service.
 - ii. Number of such lines that were migrated from a CLEC's retail service.
- f. Newly installed residential lines served by non-circuit switches;
 - i. Number of such lines that were migrated from the ILEC's retail service.
 - ii. Number of such lines that were migrated from a CLEC's retail service.

For lines migrated from a CLEC's retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

RESPONSE: The answer to all of the above subparts is zero (0).

MCI-CLEC-8 Please provide, on a statewide, CLEC switch CLLI-code, and Verizon wire center basis, for the most recently available time period, the total number of:

- a. Active business lines served by unbundled loops;
- b. Active business lines served by UNE-P;
- c. Active business lines served by non-circuit switches;
- d. Active residential lines served by unbundled loops;
- e. Active residential lines served by UNE-P;
- f. Active residential lines served by non-circuit switches.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

RESPONSE: The answer to all of the above subparts is zero (0).

MCI-CLEC-9 If you do not currently offer service to business customers in Massachusetts below the DS-1 level (i.e., DS-0/voice grade loops), please list and describe your reasons for not doing so.

RESPONSE: It is not part of Focal's business plan to offer service to business customers in Massachusetts below the DS1 level

MCI-CLEC-10 If you currently offer service to business customers in Massachusetts below the DS-1 level (i.e., DS-0/voice grade loops), but do not offer and/or market service to such customers unless they have or need a certain minimum number of loops to their premises, please state that minimum number, and list and describe your reasons for not offering and/or marketing service below that level.

RESPONSE: This question is not applicable.

MCI-CLEC-11

For each switch identified in your response to CLEC-5, please provide the information requested in TABLES 1A, 1B, and 1C. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

RESPONSE:

Focal provides T-1 and above services to business customers. Focal does not provide DSL services.

TABLE 1A

CLEC Switch CLLI	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers ¹	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers ²
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

¹ This category includes loops used for fax and/or modem-only traffic.

² This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

TABLE 1B

ILEC Wire Center	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers ³	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers ⁴
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

³ This category includes loops used for fax and/or modem-only traffic.

⁴ This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

TABLE 1C

State Of Massachusetts	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers ⁵	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers ⁶
	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

⁵ This category includes loops used for fax and/or modem-only traffic.

⁶ This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

MCI-CLEC-12 For each switch identified in your response to CLEC-5 other than circuit switches, please provide the following for each switch:

- a. the date(s) on which you installed the switch and began providing local exchange service on the switch;
- b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;
- c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

RESPONSE: This question is not applicable.

MCI-CLEC-13 Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products, either by geography, class of customer, or otherwise? If so, please explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).

RESPONSE: No, Focal's Massachusetts intrastate tariffs do not limit in any way the availability of its local exchange service products.

MCI-CLEC-14 Have you made any changes to your Massachusetts intrastate tariffs in the last 24 months that would limit the availability of your local exchange service, either by restricting the geographic area in which you offer your service, restricting the customers to whom you service is available, or otherwise? If so, please explain.

RESPONSE: No, Focal has not made any changes to its Massachusetts intrastate tariffs in the last 24 months that would limit the availability of its local exchange service.

MCI-CLEC-15

Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating "Yes" or "No" in each box.

RESPONSE:

Focal utilizes newly leased facilities to serve its customers and does not conduct customer migrations as described above.

	TO VZ voice only	TO VZ voice plus DSL	TO VZ DSL only	TO CLEC UNE-P voice only	TO CLEC switch-based voice only	TO CLEC line sharing	TO CLEC line splitting	TO CLEC DSL only
FROM VZ voice only								
FROM VZ voice plus DSL								
FROM VZ DSL only								
FROM CLEC UNE-P voice only								
FROM CLEC switch-based voice only								
FROM CLEC line sharing								
FROM CLEC line splitting								
FROM CLEC DSL only								

MCI-CLEC-16 Please explain whether you have always been able to obtain a customer service record ("CSR") from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

RESPONSE: This question is not applicable. Focal does not utilize UNE-P or UNE-L.

MCI-CLEC-17 Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

RESPONSE: Focal objects to this question on the grounds that it appears to be irrelevant to any issue in this proceeding or to the fact-based triggers defined by the FCC. Notwithstanding this objection, Focal provides the following responses to the subparts herein:

c)No. Manual intervention is required.

d) Focal has the choice of using an electronic system or an 800 telephone number. Focal typically uses Verizon's Ticketing Access Gateway ("VTAG", which is an electronic system.

e) Yes. The electronic invoices are sent via an NDM connection, which is automated between Verizon and Focal. Focal uses the electronic detail to compile disputes and report at a circuit level but pays the invoices based on a hard copy of the invoice.

MCI-CLEC-18 Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

RESPONSE: Focal objects to this question on the grounds that it appears to be irrelevant to any issue in this proceeding or to the fact-based triggers defined by the FCC.

MCI-CLEC-19 Please explain whether you currently have in place and use electronic automated systems to:

- a: Process orders placed by customers whose service will be provisioned using your own switches.
- b. Provision service for customers using your own switches
- c: Maintain and repair service for customers whose service is provisioned using your own switches.
- d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
- e. Conduct testing for customer services provisioned via your own switches using UNE loops.
- f. Bill customers whose services are provisioned using your own switches.

If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

RESPONSE: Focal objects to this question on the grounds that it appears to be irrelevant to any issue in this proceeding or to the fact-based triggers defined by the FCC.